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SIPDIS

USDOC FOR 532/OEA/LHINES/DFARROW
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR WILLIAM
ZARIT
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A
TAGS: [BMGT](#) [BEXP](#) [HK](#) [ETRD](#) [ETTC](#)
SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION:
TECHCOMP LIMITED

REF: A) USDOC 03318

1.Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

12. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO) conducted a post shipment-verification at Techcomp Limited, 6/F, Mita Centre, 552-556 Castle Peak Road, Kwai Chug, Kowloon, Hong Kong (Techcomp). The tem in question is a GENESIS XM2, EDS, KIT, DPP-I exported to Techcomp on or about February 18, 007 and valued at USD 36,000. On the applicableshippers export declaration (SED), the item is classified as 3A999. Items properly classified as 3A999 may be exported/reexported to virtually all destinations and end-users worldwide, license free, except for certain designated state sponsors of terrorism (including North Korea). The exporter was Edax, Inc. of Mahwah, New Jersey.

13. According to the Hong Kong Companies Registry, Techcomp has been in existence since 1991. Its paid-up share capital is the Hong Kong equivalent of approximately USD 1.2 million. The Commercial Registry lists Hong Kong ID holders Wai Shing Chan and Yat Keung Lo as directors. Techcomp has affiliated offices in China and Singapore. (more information at www.techcomp.com.hk).

14. On April 24, 2007, the ECO met with Mr. Wilson Wong, Shipping and Logistics Manager who provided detail about Techcomp (much of it included on the web site referenced above). Techcomp Holdings Limited is engaged in the design, development, manufacture and distribution of analytical instruments, life science equipment and laboratory instruments. Techcomp Holdings Limited is a Singapore listed company with a range of liaison offices in mainland China as well as subsidiaries in Hong Kong and Singapore. The Singapore office is responsible for operations and sales in Southeast Asia and covers India, Pakistan, Vietnam, Thailand, the Philippines, and the UAE, among others. Roughly 90% of Techcomp's products are sold into mainland China. Mr. Wong stated that Techcomp does little trade in items included on Hong Kong's strategic commodities list.

15. As to the specific item in question, Mr. Wong

provided copies of the relevant shipping documents showing that the item had been received in Hong Kong and was subsequently shipped to mainland China. The end-user is TPK Optical Solutions Inc. (Xiamen), a touch-screen manufacturer.

¶6. At the time visited, Techcomp appeared to be a suitable recipient of the commodities shipped (as reseller) since Techcomp cooperated with the PSV and provided all requested information concerning the final disposition of the applicable items. At the same time, the ECO was not able to inspect the subject items as they had already been delivered to Techcomp's customer.

Consistent with guidance on reporting of PSVs where the items cannot be physically inspected, the ECO recommends that this PSV be classified as Limited.

Cunningham